

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

JOSEPH PASTORE

Plaintiff,

V.

C.A. No. 04-12374 REK

REISS INDUSTRIES, LTD. dba HYDRO  
COMPONENTS & SYSTEMS, LLC, and  
LAMINATIONS, INC.

Defendants.

**DEFENDANT “REISS INDUSTRIES, LTD.” MOTION TO DISMISS<sup>1</sup>**

Defendant Reiss Industries, Ltd. hereby moves, pursuant to Fed. R. Civ. P. 12(b)(2), to dismiss plaintiff Joseph Pastore's Complaint on the grounds that this court lacks personal jurisdiction over defendant Reiss Industries, Ltd. Further grounds for this Motion to Dismiss are set forth in the Reiss Industries, Ltd. Memorandum of Law and Affidavit of Thomas Reiss, Jr., submitted herewith.

## REQUEST FOR ORAL ARGUMENT

Pursuant to Local Rule 7.1(D), defendant respectfully requests a hearing on this Motion to Dismiss.

<sup>1</sup> See Affidavit of Thomas J. Reiss, Jr., filed herewith, at ¶2, for an explanation of the correct party names.

**WHEREFORE**, defendant Reiss Industries, Ltd. respectfully requests that this Court dismiss the plaintiff's Complaint in its entirety.

Respectfully submitted,

REISS INDUSTRIES, LTD.  
d/b/a HYDRO COMPONENTS & SYSTEMS,  
LLC, and LAMINATIONS, INC.,

By their attorneys,

/s/ Wendy S. Plotkin

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**Certification Pursuant to Local Rule 7.1.**

I, Wendy S. Plotkin, counsel for Reiss Industries, Ltd., hereby certify that I conferred with counsel for Joseph Pastore and that we were not able to reach resolution on the issues raised in this motion.

/s/ Wendy S. Plotkin

